

From: Smith, Charles [Smith.Charles@epa.gov]
Sent: 3/10/2021 11:16:26 PM
To: Dinkins, Darlene [Dinkins.Darlene@epa.gov]; Richmond, Jonah [Richmond.Jonah@epa.gov]
CC: Goodis, Michael [Goodis.Michael@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Overstreet, Anne [overstreet.anne@epa.gov]; Diaz, Catherine [Diaz.Catherine@epa.gov]; Cyran, Carissa [Cyran.Carissa@epa.gov]; Mendelsohn, Mike [Mendelsohn.Mike@epa.gov]
Subject: RE: GM Mosquitoes - EPA EUP approval discussion
Attachments: smime.p7s

As you know Jonah, we have responded to this group several times before and Alex/OPP met with them once as well. In addition to the response Darlene mentions, we can dust off the 1-pager for this issue to share with Michal so she has more background info. We should be able to get you something like that tomorrow.

Charles "Billy" Smith
Acting Division Director
Biopesticides and Pollution Prevention Division
Office of Pesticide Programs

From: Dinkins, Darlene <Dinkins.Darlene@epa.gov>
Sent: Wednesday, March 10, 2021 6:12 PM
To: Richmond, Jonah <Richmond.Jonah@epa.gov>
Cc: Smith, Charles <Smith.Charles@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Overstreet, Anne <overstreet.anne@epa.gov>; Diaz, Catherine <Diaz.Catherine@epa.gov>; Cyran, Carissa <Cyran.Carissa@epa.gov>
Subject: FW: GM Mosquitoes - EPA EUP approval discussion

Hi Jonah,

I just received the draft response to the attached letter from Rep. Gimenez from CSB today. Once it clears the OPP IO, we'll send it to you for OCSPP IO review.

Darlene Dinkins
Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 305-5214

From: Richmond, Jonah <Richmond.Jonah@epa.gov>
Sent: Wednesday, March 10, 2021 4:52 PM
To: Smith, Charles <Smith.Charles@epa.gov>
Cc: Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Overstreet, Anne <overstreet.anne@epa.gov>; Diaz, Catherine <Diaz.Catherine@epa.gov>
Subject: FW: GM Mosquitoes - EPA EUP approval discussion

Billy and OPP IO,

Michal is seeking guidance on how to respond to this request from the Florida Keys Environmental Coalition.

Thank you,

Jonah

Jonah Richmond

Special Assistant

Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency

(202) 564-0210

From: Freedhoff, Michal <Freedhoff.Michal@epa.gov>

Sent: Wednesday, March 10, 2021 2:51 PM

To: Richmond, Jonah <Richmond.Jonah@epa.gov>

Cc: Tyler, Tom <Tyler.Tom@epa.gov>

Subject: FW: GM Mosquitoes - EPA EUP approval discussion

Hi Jonah

Could you please get the program's recommendation on this? It's not clear that they're asking for a meeting with me, though they are clearly looking to talk to someone.

Thanks

Michal

Michal Freedhoff, Ph.D.

Acting Assistant Administrator

Office of Chemical Safety and Pollution Prevention

U.S. Environmental Protection Agency

Freedhoff.michal@epa.gov

From: Nishida, Jane <Nishida.Jane@epa.gov>

Sent: Wednesday, March 10, 2021 1:36 PM

To: Freedhoff, Michal <Freedhoff.Michal@epa.gov>; Frey, Christopher <Frey.Christopher@epa.gov>; Adhar, Radha <Adhar.Radha@epa.gov>

Cc: Utech, Dan <Utech.Dan@epa.gov>; Cassady, Alison <Cassady.Alison@epa.gov>; Garbow, Avi <Garbow.Avi@epa.gov>; Hamilton, Lindsay <Hamilton.Lindsay@epa.gov>

Subject: FW: GM Mosquitoes - EPA EUP approval discussion

FYI

From: Barry Wray <support@fkec.org>

Sent: Wednesday, March 10, 2021 12:38 PM

To: Nishida, Jane <Nishida.Jane@epa.gov>

Cc: engagement@ostp.eop.gov; president@whitehouse.gov; NSTC@OSTP.eop.gov; vice.president@whitehouse.gov; Ed Russo <erusso7404@aol.com>; Mara Daly <maradaly37@yahoo.com>; Meagan Hull <morrisonmeagan2014@gmail.com>; Dana Perls <DPerls@foe.org>; Jaydee Hanson <jhanson@centerforfoodsafety.org>; Diane Reeves <gmofreeusa@gmail.com>

Subject: GM Mosquitoes - EPA EUP approval discussion

Dear Administrator Nishida,

I am writing today to request a discussion and your direct oversight regarding the EPA 2020 Experimental Use Permit (EUP) EPA-HQ-OPP-2019-0274 approval paving the way for Oxitec, the product vendor, for open field release the

OX5034 germ-line edited, gene-drive species of mosquito in the FL Keys. This EUP was approved without sufficient scientific investigation into this complex and novel technology, under duress created by a political operative during the prior administration.

Our concerns increase daily as the pending first release is planned in a matter of weeks. We ask for your review and intervention with an immediate pause for any planned releases, to provide sufficient time for investigation. Together with President Biden's directive on trust and scientific integrity, we feel it is imperative that this EUP be revoked and a proper scientific investigation ensue into this technology (<https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/memorandum-on-restoring-trust-in-government-through-scientific-integrity-and-evidence-based-policy-making/>). Our Congressman Gimenez has submitted an official Congressional Letter of Inquiry to the EPA on this subject as well (<https://www.facebook.com/groups/FKEC.org/permalink/5276401789067719/>). The level of investigation required to understand the true quantifiable risks associated with this technology will benefit all stakeholders, the EPA, the Vendor, our community and the ecosystems we are stewards of.

The group I represent, the Florida Keys Environmental Coalition (FKEC.org) and a much broader coalition that includes respected science based NGOs and many recognize leaders in the fields of genetic engineering, microbiology and ethics, stand in objection to the open release of this technology. We object to the release with a comprehensive understanding of the scientific issues that have not been properly independently investigated, set against the background of documented political interference via a high profile influential lobbyist, Roy Bailey, who successfully excerpted pressure upon the EPA during an opportune period. The actual announcement of the EUP comment period, was accompanied a two page marketing memo as sufficient content for the public to respond with specific relevant input. At the end of the comment period over 31,000 comments had been lodge against the release with 56 for.

Germane to this discussion is the context of this particular vendor's documented performance with their proprietary technology, which includes repeated failure, ethical violations in many global venues and clear departure from scientific principles and methods in order to misrepresent facts, apparently motivated by product marketability goals. In their application for a similar EUP, to release the OX513A version of their technology, our meetings with the EPA science team clearly identified scientific concerns with the technology and cognizant significant misrepresentations made by the vendor in their submission package.

We can assemble a team of relevant scientific contributors, including heads of Genetic Engineering programs, professors in Microbiology and a variety of experts from notable US Universities, who are in support of this field of discovery, but express clear objection to any release with the level of investigation that was provided under a cloud of political influence, enabled by conditions fostered under the last administration.

We look forward to your acknowledgement and response to this issue. This is not a FL Keys, issue this is a national issue enabling the release of a genetically modified gene drive species without proper knowledge of what the risks are.

Thank you for your time.

Barry Wray
Executive Director
Florida Keys Environmental Coalition
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